

Schnitzer, Edward L.

From: Hwang, Angeline <Angeline.Hwang@weil.com>
Sent: Friday, November 8, 2019 1:56 PM
To: Schnitzer, Edward L.; TumSuden, Kyle J.; Fail, Garrett; Singh, Sunny
Cc: Project Blue Admin Team; Sears Admin Consent Program
Subject: RE: Sears/Ninth Omni Objection

Ed – M-III has requested the below information for the reconciliation process, in excel if possible:

Include the following fields at a minimum (if applicable):

1. DUNS (unique identifier(s) with Sears and its affiliates)
2. DBA name(s) (Doing Business As, if there is another name your company goes by)
3. Invoice Number
4. Purchase Order Number
5. Invoice Date
6. Invoice Amount
7. 503(b)(9) "Y" or "N": (mark "Y" next to any invoices you believe are entitled to priority pursuant to section 503(b)(9) of the United States Bankruptcy Code)
8. Administrative "Y" or "N" (Post-petition/Post-Bankruptcy): (mark "Y" next to any invoices you believe are post-petition/post-bankruptcy administrative invoices)

Angeline Hwang

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From: Schnitzer, Edward L. <ESchnitzer@mmwr.com>
Sent: Friday, November 8, 2019 1:44 PM
To: Hwang, Angeline <Angeline.Hwang@weil.com>; TumSuden, Kyle J. <Kyle.TumSuden@weil.com>; Fail, Garrett <Garrett.Fail@weil.com>; Singh, Sunny <sunny.singh@weil.com>
Cc: Project Blue Admin Team <Project.Blue.Admin.team@weil.com>; Sears Admin Consent Program <searsadminconsentprogram@miiipartners.com>
Subject: RE: Sears/Ninth Omni Objection

Thank you Angeline. I will let the client know so that they do not have to prepare for the 11/20 hearing.

As for reconciliation, and as per our discussion, we will then wait on the ballot. We would like to opt-in, but are not comfortable doing so unless we know that the Debtors agree with the amount of the claim. Hopefully the professionals can reconcile the claim prior to the voting deadline.

Thank you.

-Ed

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From: Hwang, Angeline [mailto:Angeline.Hwang@weil.com]
Sent: Friday, November 08, 2019 12:16 PM
To: Schnitzer, Edward L.; TumSuden, Kyle J.; Fail, Garrett; Singh, Sunny
Cc: Project Blue Admin Team; Sears Admin Consent Program
Subject: RE: Sears/Ninth Omni Objection

Ed – the Debtors will withdraw the objection to your client's claim but we will still need to reconcile the amount of the claim. Happy to discuss.

Angeline Hwang

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From: Schnitzer, Edward L. <ESchnitzer@mmwr.com>

Sent: Thursday, November 7, 2019 4:58 PM

To: TumSuden, Kyle J. <Kyle.TumSuden@weil.com>; Fail, Garrett <Garrett.Fail@weil.com>; Singh, Sunny

<sunny.singh@weil.com>; Marcus, Jacqueline <jacqueline.marcus@weil.com>

Subject: RE: Sears/Ninth Omni Objection

Importance: High

All,

I am following-up regarding my email below.

Please let me know if we can discuss this sometime tomorrow.

-Ed

Edward L. Schnitzer | Partner | Chair, Bankruptcy & Financial Restructuring Group Montgomery McCracken
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